

February 8, 2019

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Reserve Communications and Computer Corporation &
EATELCORP, L.L.C. Joint Application Pursuant to Section
214 of the Communications Act and Section 63.04 of the
Commission's Rules—WC Docket No. 19-8

Dear Ms. Dortch:

In connection with the above-captioned application (the “Application”) for FCC consent to transfer of control of EATELCORP, L.L.C. (“EATEL”), the parent company of certain holders of Commission authority to provide domestic interstate telecommunications service pursuant to Section 214 of the Communications Act and Section 63.01 of the Commission’s rules, to Reserve Communications and Computer Corporation (“Reserve”), EATEL and Reserve provide the following supplemental information:

The Transferee, Reserve, is a holding company and does not provide telecommunications services in its own right. Two subsidiaries of Reserve provide domestic interstate telecommunications services: Reserve Telephone Company, Inc., an incumbent local exchange carrier (“ILEC”), serves approximately 2,036 local exchange customers in Garyville, Mount Airy and Reserve, Louisiana; and Reserve Long Distance Company, Inc. (“RLD”), an interexchange carrier and competitive local exchange carrier (“CLEC”), serves approximately 3,346 local exchange customers in Laplace, the northern portion of Lafourche Parish, and St. James Parish, Louisiana.

The CLEC territories served by RLD overlap the CLEC territories served by EATEL subsidiary Advanced Tel, LLC (“Advanced”) only to a *de minimis* extent.¹ First, Advanced has deployed fiber-based service to a single business customer at Sunshine Bridge, in St. James Parish; RLD also has facilities in St. James parish, but has no current subscriber at Sunshine Bridge. Second, Advanced provides CLEC service to

¹ A graphic depiction of the ILEC and CLEC service territories of Reserve and EATEL is provided in Exhibit C of the Application.

approximately 27 customers, and RLD provides CLEC service to approximately 144 customers, in Thibodaux, a town of roughly 14,600 residents in Lafourche parish.² The service territories of these two CLECs in Lafourche parish overlap only in an area of roughly seven square miles. Both CLECs compete with an unaffiliated ILEC that is far larger in size (in terms of customer base as well as overall resources) and has far greater operational scope in this part of Louisiana and beyond.

Reserve is wholly-owned by RTC Interco, L.L.C., a holding company based in Louisiana, which in turn is wholly-owned by RTC Holdings, L.L.C. (“RTC Holdings”), a holding company based in Louisiana. The entities holding ten percent or more of the equity or voting equity of RTC Holdings are three investment trusts established for the benefit of members of the Reilly family, disclosed in Section IV.h. of the Application (pp. 10-11). The individuals holding ten percent or more of the equity or voting equity of those entities, or otherwise have a controlling interest in those entities, are as follows:

Jennifer and Sean Reilly Family, LLC: -- A Louisiana Investment Trust

Beneficial owners:

Name: Anna M. Reilly
Address: 2987 Reymond Avenue
Baton Rouge, La 70808
Citizenship: USA
% Interest: 33.33%

Name: Aidan C. Reilly
Address: 2987 Reymond Avenue
Baton Rouge, La 70808
Citizenship: USA
% Interest: 33.33%

Name: Rowan P. Reilly
Address: 2987 Reymond Avenue
Baton Rouge, La 70808
Citizenship: USA
% Interest: 33.33%

Trustee & Managing Member of LLC:

Name: Kevin P. Reilly Jr.
Address: 5321 Corporate Blvd
Baton Rouge, La 70808
Citizenship: USA

² The population of Thibodaux was 14,566, according to the 2010 census, and was estimated at 14,713 as of July 1, 2017. See U.S. Census Bureau: <https://www.census.gov/quickfacts/fact/table/thibodauxcitylouisiana,la/PST045218>.

Ninemile, L.L.C. – A Louisiana Investment Trust

Beneficial owners:

Name: Hayden M. Reilly
Address: 5321 Corporate Blvd
Baton Rouge, La 70809
Citizenship: USA
% Interest: 50%

Name: Ross L. Reilly
Address: 2750 McConnell Drive
Baton Rouge, La 70809
Citizenship: USA
% Interest: 25%

Name: Finn Patrick Reilly (minor child)
Address: 2750 McConnell Drive
Baton Rouge, La 70809
Citizenship: USA
% Interest: 12.5%

Name: Reed David Reilly (minor child)
Address: 2750 McConnell Drive
Baton Rouge, 70809
Citizenship: USA
% Interest: 12.5%

Trustees:

Name: Hayden M. Reilly
Address: 5321 Corporate Blvd.
Baton Rouge, La 70808
Citizenship: USA

Name: Ross L. Reilly
Address: 2750 McConnell Drive
Baton Rouge, La 70809
Citizenship: USA

Managing Member of LLC:

Name: Kevin P. Reilly Jr.
Address: 5321 Corporate Blvd.
Baton Rouge, La 70808
Citizenship: USA

Reilly Family Limited Partnership

General partners:

Name: Kevin P. Reilly Jr.
Address: 5321 Corporate Blvd.
Baton Rouge, La 70808
Citizenship: USA
% Interest: 25%

Name: Anna Reilly Cullinan
Address: 2797 Acorn Court
Winston Salem, NC 27106
Citizenship: USA
% Interest: 25%

Name: Sean Reilly
Address: 2987 Reymond Avenue
Baton Rouge, La 70808
Citizenship: USA
% Interest: 25%

Name: Wendell Gray Reilly
Address: 1436 Fairview Rd. NE
Atlanta, GA 30306
Citizenship: USA
% Interest: 25%

To the knowledge of Reserve, none of the individuals or entities disclosed above either themselves hold any FCC authorizations to provide telecommunications services, or directly or indirectly own or control ten percent or more of any entity that holds any FCC authorizations to provide telecommunications services.

Please direct any questions concerning this filing to me.

Respectfully submitted,



Karen Brinkmann
Counsel for the Applicants

cc: Gregory Kwan, Wireline Competition Bureau